

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN SECTION OF TENNESSEE  
WESTERN DIVISION

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SCOTT TURNAGE , CORTEZ D. )  
BROWN, DEONTAE TATE, JEREMY S. ) Case No. 2:16-cv-2907-SHM/tmp  
MELTON, ISSACCA POWELL, KEITH )  
BURGESS, and TRAVIS BOYD on behalf )  
of themselves and all similarly situated )  
persons, )  
)  
PLAINTIFFS, ) CLASS ACTION COMPLAINT FOR  
v. ) VIOLATIONS OF THE CIVIL RIGHTS  
) ACT OF 1871, 42 U.S.C. § 1983, AND  
) TENNESSEE COMMON LAW  
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DEFENDANTS. )

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MOTION AND MEMORANDUM IN SUPPORT FOR WITHDRAWAL OF JOSHUA  
SPICKLER AS COUNSEL OF RECORD

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Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell, Keith Burgess, and Travis Boyd move the Court to enter an Order allowing Attorney Joshua Spickler to withdraw as counsel of record and, in support of their Motion, state as follows:

**Memorandum of Facts and Law in Support of Motion**

1. Plaintiffs request that Joshua Spickler be permitted to withdraw from this case as counsel of record.
2. The Plaintiffs will continue to be represented Michael G. McLaren, William E. Cochran, Jr., Brice Moffatt Timmons, Frank L. Watson, William F. Burns, Claiborne Ferguson, and Joseph Z. Ozment.
3. The withdrawal, if granted, will not prejudice the Defendants, and will cause no delay in this civil action.
4. Pursuant to Local Rule 7.2(a)(1)(B), counsel for Plaintiffs counsel has consulted with Defendants' counsel and Defendants' counsel does not object to the relief sought in this Motion. *See* Certificate of Consultation by Counsel.
5. A proposed Order granting the Motion will be emailed to the Court.

WHEREFORE, Plaintiffs respectfully request that the Court enter an Order allowing Joshua Spickler to withdraw as counsel of record.

Respectfully submitted,

/s/ Joshua Spickler  
Joshua Spickler  
902 South Cooper Street  
Memphis, TN 38104

**CERTIFICATE OF CONSULTATION BY COUNSEL**

On September 13, 2017, Plaintiffs' consulted via electronic mail with counsel for Defendants, concerning the matters set forth in this Motion and Memorandum. Defendants' counsel advised that they *do not object* to the relief sought.

**CERTIFICATE OF SERVICE**

The foregoing document was filed via the Court's CM/ECF system, automatically effecting service on counsel of record for all other parties to this action, on this 13th day of September, 2017.

s/ Josh Spickler